

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

LAM RESEARCH CORPORATION, a  
Delaware corporation,

Plaintiff,

vs.

SUBHASH DESHMUKH, a Washington  
resident,

Defendant.

Cause No. CV4-5435FDB

**STIPULATION AND ORDER TO EXTEND  
DEADLINES FOR EXPERT WITNESS  
AND REBUTTAL EXPERT WITNESS  
DISCLOSURE IDENTIFIED IN ORDER  
SCHEDULING TRIAL AND PRETRIAL  
DATES**

**NOTE FOR MOTION CALENDAR:**

**I. MOTION**

Lam Research Corporation (hereinafter "Lam") and Defendant Subhash Deshmukh, pursuant to Local Rule CR 7(d)(1), move for an order extending the deadlines to disclosure primary and rebuttal expert witnesses. A 17 day extension is sought for each disclosure. There have been no previous requests for extensions of any of the dates identified in the Court's Order Setting Trial and Pretrial Dates, and the parties do not wish or intend for this requested extension to have any impact upon the existing discovery cut-off date in this matter and/or the impending trial date identified in the Court's Order. Additional time is required so that the parties'

1    respective experts have adequate time to file their reports, in light of the fact that both experts  
2    are teaching professors at the University of California at Berkeley and classes are about to begin.  
3    The extension would allow for adequate time to complete the at-issue reports given such issues.  
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5                    Stipulated to this \_\_\_\_ day of \_\_\_\_\_ 2005.  
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8                    HOLLAND & KNIGHT LLP  
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10                   By: \_\_\_\_\_  
11                   Alexander A. Baehr, WSBA No. 25230  
12                   Attorneys for Plaintiff

13                   CORR, CRONIN, MICHELSON,  
14                   BAUMGARDENDER & PREECE, LLP

15                   By: \_\_\_\_\_  
16                   Kelly P. Corr, WSBA No. 00555  
17                   Kelsey Joyce, WSBA No. 29280  
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1 **ORDER**

2 Pursuant to Local Rule CR 10(g), it is so ORDERED.

3 Entered this 24<sup>th</sup> day of August 2005.

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5 **FRANKLIN D. BURGESS**  
6 **UNITED STATES DISTRICT JUDGE**

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8 Presented by:

9 **HOLLAND & KNIGHT LLP**

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Alexander A. Baehr, WSBA No. 25320  
12 Attorneys for Plaintiff.

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